



October 29, 2024

VIA ELECTRONIC FILING

Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1506
New York, NY 10007

If Petitioners seek to respond to Respondent's motion to stay this proceeding, they shall do so no later than November 5, 2024.

SO ORDERED.

Hon. Ronnie Abrams
October 30, 2024

**Re: *Certain Underwriters at Lloyd's, London, et al v. Parish of Lafourche*
Case No. 1:24-cv-06097-RA**

Your Honor:

Our office submits this letter motion pursuant to Rule 4(E) of Your Honor's Individual Rules and Practices in Civil Cases on behalf of Respondent Parish of Lafourche, and respectfully requests that this Court stay the choice of umpire as to Indian Harbor Insurance Company, QBE Specialty Insurance Company, Steadfast Insurance Company, General Security Indemnity Company of Arizona, United Specialty Insurance Company, Lexington Insurance Company, Safety Specialty Insurance Company and Old Republic Union Insurance Company for the reasons set forth herein.

On October 25, 2024, in *Police Jury of Calcasieu Par. v. Indian Harbor Ins. Co.*, the Louisiana Supreme Court determined that domestic insurers do not have a right to arbitrate against political subdivisions. No. 024-00449 (La. 10/25/24); 2024 WL 4579035. Therefore, these domestic insurers do not have a right to arbitration here. To that end, the Parish of Lafourche has filed a motion to lift the stay and dismiss the arbitration proceedings in accordance with the Louisiana Supreme Court's opinion. *See Parish of Lafourche v. Indian Harbor Ins. Co.*, et al., No. 23-3472, R. Doc. 35 (E.D. La. Oct. 28, 2024).

Accordingly, Respondent Parish of Lafourche respectfully requests that the Court stay this proceeding while the United States District Court for the Eastern District of Louisiana considers the Louisiana Supreme Court's decision and whether to lift its order staying the proceedings before that court and allowing the case against the above-referenced domestic insurers to proceed to trial.

Respectfully submitted,

/s/ Brady Williamson
Brady Williamson, Esq.

cc: All Counsel of Record (via ECF)

